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By ECF

April 24, 2023

Hon. Naomi Reice Buchwald
United States District Court Judge
Southern District of New York
500 Pearl St.
New York, NY 10007

RE: RINA OH n/k/a RINA OH AMEN v VIRGINIA L. GIUFFRE, Case No.: 1:21-cv-08839-NRB

Your Honor:

Counsel for Defendant VIRGINIA L. GIUFFRE, respectfully submits this letter, on consent, requesting a brief extension of time for the parties to complete discovery. The parties have engaged in productive discovery conferences, exchanged first requests and responses for paper and ESI discovery, and have made good faith effort to comply with the discovery deadlines.

However, unanticipated delays have occurred. For example, for Defendant Giuffre to meaningfully comply with Plaintiff's document production requests, Ms. Giuffre has had to engage in significant efforts to thoroughly search for relevant and related ESI. Further, other unrelated civil actions that Ms. Giuffre has been a party to have issued sealing and protective orders. As such, Ms. Giuffre has to ensure that she is not in violation of any court orders.

In addition, Plaintiff is requiring an in person deposition of Ms. Giuffre. Ms. Giuffre is currently living in Australia and therefore travel to the United States requires her to make substantial and lengthy travel plans and childcare arrangements. Therefore, the first possible date is May 31st, 2023.

The parties have completed discovery as follows:

1. Both parties have served and responded to their first set of discovery requests.
2. On April 11 and 12, 2023, Defendant Giuffre has served Subpoenas to Testify on four non-party witnesses.
3. April 21, 2023, the Subpoena to Testify was out for service on the fifth non-party witness.
4. April 21, 2023, Plaintiff Oh served a Rule 45 Notice to Defendant Giuffre for a non-party subpoena for production of documents.
5. Plaintiff Oh confirmed her appearance for her in person deposition on April 25, 2023

6. Defendant Giuffre confirmed her appearance for her in person deposition scheduled for May 31, 2023.
7. The first non-party witness deposition is confirmed for May 10, 2023.
8. The second non-party witness deposition is confirmed for May 11, 2023.
9. The third non-party witness deposition is confirmed for May 15, 2023.

The parties have engaged in productive discovery. Therefore, the parties respectfully request a brief extension pursuant to the below-mentioned proposed discovery schedule in order to continue to make good faith efforts to timely complete discovery.

Should the Court approve of the proposed dates, then the parties will submit a proposed discovery order as follows:

1. Plaintiff's deposition shall be adjourned to April 24, 2023.
2. Defendant's deposition shall be adjourned to May 31, 2023.
3. Non-party depositions shall be completed by May 21, 2023.
4. All fact discovery shall be completed no later than July 28, 2023.
5. The parties shall file a joint status report with the Court on July 28, 2023.
6. Expert discovery shall be conducted on the following schedule:
 - a. Any Plaintiff's expert reports shall be served no later than August 11, 2023.
 - b. Defendants' rebuttal reports shall be served no later than September 11, 2023.
 - c. Expert discovery shall be completed no later than October 10, 2023.
7. A pre-motion letter shall be submitted to the Court pursuant to Judge Naomi Reice Buchwald's individual Court rules by October 24, 2023.
8. Any dispositive motions to be filed by November 27, 2023.
9. The parties shall submit joint status reports to the Court, regarding the case and Readiness of the case for trial no later than December 4, 2023.

Respectfully submitted,

_____/s/_____
Kathleen R. Thomas, Esq.

Jillian Roth, Esq.
(*Pro Hac Vice Pending*)

CC via ECF:
Alexander M. Dudelson, Esq.